



GOODWIN

Daniel Roeser
+1 212 459 7276
DRoeser@goodwinlaw.com

MEMO ENDORSED

September 1, 2022

USDC SDNY
Goodwin Procter LLP
DOCUMENT The New York Times Building
1200 Eighth Avenue
New York, NY 10018
ELECTRONICALLY FILED
goodwinlaw.com
DOC #: +1 212 813 8800
DATE FILED: 9/6/2022

VIA ECF

The Honorable Lewis A. Kaplan
U.S. District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Granted. SO ORDERED.

/s/ Lewis A. Kaplan (mab)
Hon. Lewis A. Kaplan, U.S.D.J.
Dated: September 6, 2022

Re: PRCM Advisers LLC, et al. v. Two Harbors Investment Corp., Case No. 1:20-cv-05649-LAK

Dear Judge Kaplan:

We represent Defendant Two Harbors Investment Corp. (“Two Harbors”) in the above-referenced matter. Two Harbors respectfully submits this letter motion (1) to obtain the Court’s approval to redact personal e-mail addresses provided in Exhibits I and K filed in connection with Two Harbors’ Letter Motion for Leave to File a Motion to Compel (ECF No. 150) and (2) solely on behalf of Plaintiffs, to obtain the Court’s approval to redact Exhibits L, P, Q, and R filed in connection with the same motion.

First, Two Harbors requests to redact the portions of Exhibits I and K that contain personal e-mail addresses of Two Harbors’ directors. Exhibit I is a letter from Heather McElroy to Christine Sama dated August 10, 2022, that includes Two Harbors directors’ personal e-mail addresses on page 3. Exhibit K is a letter from Christine Sama to Heather McElroy dated August 16, 2022, that includes a Two Harbors director’s personal e-mail address in footnote 2 on page 4. Two Harbors respectfully requests that those personal e-mail addresses not be made publicly available. Two Harbors has filed publicly versions of Exhibits I and K with the proposed redactions and has filed under seal unredacted versions of Exhibits I and K with the proposed redactions highlighted.

Second, Two Harbors requests solely on behalf of Plaintiffs to redact portions of Exhibits L, P, Q, and R to Two Harbors’ Letter Motion for Leave to File a Motion to Compel.

Exhibit L includes e-mails showing Thomas Siering’s use of personal e-mail for work purposes, and Exhibit P includes e-mails showing Brian Taylor’s use of personal e-mail for work purposes. Two Harbors seeks approval to redact the portions of Exhibits L and P that Plaintiffs have requested to seal. Two Harbors has filed publicly versions of Exhibits L and P with the proposed redactions and has filed under seal unredacted versions of Exhibits L and P with the proposed redactions highlighted.

Exhibits Q is Pine River’s Business Continuity Plan, and Exhibit R is Pine River’s Compliance Manual. Two Harbors seeks approval to redact the portions of Exhibits Q and R that Plaintiffs have requested to seal. Two Harbors has filed publicly versions of Exhibits Q and R with the proposed redactions and has filed under seal unredacted versions of Exhibits Q and R with the proposed redactions highlighted.